

NEW HEARING DATE AND TIME: August 9, 2010 at 10:30 a.m. (Eastern Time)
OBJECTION DEADLINE (UNCHANGED): August 3, 2010 at 11:30 a.m. (Eastern Time)
NEW REPLY DEADLINE: August 5, 2010 at 12:00 p.m. (Eastern Time)

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*Attorneys for Movant Official Committee of
Unsecured Creditors Holding Asbestos-Related Claims*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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|---|---|-------------------------|
| -----X |) | |
| In re |) | Chapter 11 |
| |) | |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> , |) | |
| f/k/a GENERAL MOTORS CORP., <i>et al.</i> , |) | |
| |) | Case No. 09-50026 (REG) |
| |) | |
| Debtors. |) | Jointly Administered |
| -----X |) | |

**NOTICE OF HEARING ON APPLICATION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS HOLDING ASBESTOS-RELATED CLAIMS FOR AN
ORDER PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING THE TAKING
OF DOCUMENT DISCOVERY AND DEPOSITION TESTIMONY FROM THE
DEBTORS AND FROM GENERAL MOTORS, LLC, ITS SUBSIDIARIES AND
AFFILIATED COMPANIES**

PLEASE TAKE NOTICE that the Application of the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the “**Asbestos Claimants Committee**” or “**ACC**”) for an Order Pursuant to Bankruptcy Rule 2004 Authorizing the Taking of Document Discovery and Deposition Testimony from the Debtors and from General Motors, LLC, its Subsidiaries and Affiliated Companies (the “**Application**”) [Docket No. 6382], originally noticed for presentment on August 3, 2010, at 12:00 p.m., has been set down for hearing before the Honorable Robert E. Gerber, United States Bankruptcy Judge, One Bowling Green, Room 621, New York, New York 10004, on **August 9, 2010, at 10:30 a.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that the deadline for any responses or objections to the Application is unchanged. Accordingly, any responses or objections must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243

(Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors (the “**Committee**”), 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (ix) the U.S. Attorney’s Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants (the “**Future Claimants’ Representative**”), 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L.

Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **August 3, 2010 at 11:30 a.m. (Eastern Time)** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Application, the relief requested in the Application may be granted without a hearing.

Dated: New York, New York
August 2, 2010

Respectfully submitted,

CAPLIN & DRYSDALE, CHARTERED

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